

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-24 and 36-38 are pending in the application, with claims 1, 37, and 38 being the independent claims. Claim 1 is sought to be amended. New claims 37 and 38 are sought to be added. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 103

Claims 1, 3-11, 16-24, and 36

The Examiner has rejected claims 1, 3-11, 16-24, and 36 under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,173,266 to Marx et al. (“Marx”) in view of Angel R. Puerta, “Supporting User-Centered Design of Adaptive User Interfaces Via Interface Models” (“Puerta”). Applicants respectfully traverse this rejection.

Amended independent claim 1 recites, *inter alia*, “the deployment environment provides remote-streaming runtime access to the remote central repository.” Applicants submit that the combination of Marx and Puerta does not teach or suggest at least this feature of independent claim 1.

The Examiner acknowledges that Marx does not teach the use of a “remote central repository.” (Office Action, pp. 3 and 5). However, the Examiner adds that the

“communication interface” of Marx “would render his invention capable of interfacing with such a repository.” (Office Action, p. 3). Applicants disagree, as the ability to provide communications in Marx does not necessarily bestow the ability to provide “remote-streaming runtime access to the remote central repository,” as recited in amended claim 1. Since the Examiner acknowledges that Marx does not teach the use of a “remote central repository,” it cannot be the case that the “communication interface” of Marx would alone provide the means of streaming, at runtime, data from the repository, such as the “generic dialog asset” of claim 1.

Puerta does not supply this missing teaching. The Examiner states Puerta describes “[t]he use of a central data repository for development … [and] further explicitly shows that instances of this central repository database are deployed in a runtime system in FIG. 1. (lower right-hand corner of the drawing).” (Office Action, p. 3). Applicants submit that this is a mischaracterization of the “runtime system” of Puerta, and that this “runtime system” does not have access to a central repository database. Puerta states:

An interface model may be transformed into an executable interface specification. This specification includes a coupling mechanism with application-specific code to deliver a final application. (Puerta, p. 2).

The “interface model,” which the Examiner equates to the “remote central repository” of claim 1, is “transformed into an executable interface specification” in Puerta. There is no indication that the final runtime system has any interaction with the “interface model,” and has merely “transformed” the code and coupled it with “application-specific code” in order to “deliver a final application.” Accordingly, Puerta

does not teach that “the deployment environment provides remote-streaming runtime access to the remote central repository,” as recited in claim 1.

Applicants further note that claim 1 has been amended such that only a single repository is recited. Assuming, *arguendo*, that Puerta does teach runtime access to a remote central repository, to which Applicants do not acquiesce, there is no teaching in Puerta that this is the same remote central repository used in the “development environment,” as recited in claim 1.

The Examiner has not met the burden of providing a *prima facie* case of obviousness with regard to claim 1 over Marx and Puerta. The alleged repository in Puerta, namely the “interface model components,” is only present in the development environment. (Puerta, p. 2. “A typical architecture of a model-based *development environment* is shown in Figure 1.”). Identifying an alleged repository present only in a development environment, together with basic communications means in a deployment environment in Marx, does not support a *prima facie* case of obviousness. At a minimum, the combination does not result in the feature that the “deployment environment provides remote-streaming runtime access to the remote central repository,” as recited in claim 1, and accordingly does not render that claim obvious.

For at least these reasons, independent claim 1 is patentable over the combination of Marx and Puerta. Moreover, dependent claims 3-11, 16-24, and 36 are also not rendered obvious by the combination of Marx and Puerta for at least the same reasons as claim 1, from which they depend, and further in view of their own respective features. Reconsideration and withdrawal of the rejection of claims 1, 3-11, 16-24, and 36 is therefore respectfully requested.

Claims 2 and 12-15

The Examiner has rejected claims 2 and 12-15 under 35 U.S.C. § 103(a) as allegedly being obvious over Marx in view of Puerta, and further in view of U.S. Patent No. 5,915,001 to Uppaluru (“Uppaluru”). Applicants respectfully traverse this rejection.

As noted above, the combination of Marx and Puerta does not teach or suggest, at a minimum, “the deployment environment provides remote-streaming runtime access to the remote central repository,” as recited in independent claim 1. Uppaluru does not supply the missing teachings, and is not used by the Examiner in formulating a rejection regarding the aforementioned feature. Accordingly, claim 1 is patentable over the combination of Marx, Puerta, and Uppaluru.

Claims 2 and 12-15 are therefore not rendered obvious by the combination of Marx, Puerta, and Uppaluru for at least the same reasons as claim 1, from which they depend, and further in view of their own respective features. Reconsideration and withdrawal of the rejection of claims 2 and 12-15 is therefore respectfully requested.

New Claims

Claims 37 and 38 are sought to be added. Claim 37 recites, *inter alia*, “accessing the remote central repository at runtime through remote-streaming.” Claim 38 recites, *inter alia*, “wherein the voice application in a deployment environment accesses the remote central repository at runtime through remote-streaming.” Claims 37 and 38 are therefore patentable for at least the same reasons discussed above with regard to independent claim 1, and further in view of their own respective features. Accordingly,

Applicants believe claims 37 and 38 are in condition for allowance, and respectfully request the entry thereof.

Response to Advisory Action

Applicants would like to thank the Examiner for the additional guidance provided in the Advisory Action of November 24, 2008. In the Advisory Action, the Examiner states that “Puerta discloses only that an interface model ‘may’ be transformed into code (Page 2), thus implying that the central repository is directly accessed for dialog prompts during runtime.” (Advisory Action, p. 2). The Examiner adds that “even in the instance of the executable interface code, a coupling code is used that links the user application to the central repository prompts.” (Advisory Action, p. 2).

In response, Applicants note that neither Marx or Puerta, either alone or in combination, teach or suggest that “the deployment environment provides remote-streaming runtime access to the remote central repository,” where the remote central repository is the *same* remote central repository for “accessing in a development environment a generic dialog asset from a remote central repository,” as recited in claim 1. Accordingly, Applicants submit that claims 1-24 and 36-38 are in condition for allowance, and respectfully request the reconsideration and withdrawal of the above rejections.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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